

9. Identify the date which you contend you and McDaniel were provided notice of IRSD's intent to terminate McDaniel's contract, and the date which you contend the contract was terminated.

ANSWER 9

Objection. Plaintiff objects to this Interrogatory as it seeks to obtain information which is protected by the attorney-client privilege, the attorney work product doctrine, and seeks information which was prepared in anticipation of litigation and/or are protected by other applicable privileges. Notwithstanding and without waiving this specific objection and the general objections set forth above, on October 11, 2004 RLI was informed of the intent and actual termination of McDaniel. As discovery is ongoing and not yet completed, Plaintiff reserves the right to supplement this answer pursuant to the applicable Rules of Civil Procedure.

10. Identify all statements made by EDiS which you contend were false.

ANSWER 10

Objection. Plaintiff objects to this Interrogatory as it seeks to obtain information which is protected by the attorney-client privilege, the attorney work product doctrine, and seeks information which was prepared in anticipation of litigation and/or are protected by other applicable privileges. Without waiving these specific objections and the General Objections set forth above, and in a good faith attempt to comply with this discovery request, RLI files will be made available for inspection and copying by EDiS at a mutually convenient time and place.

11. Identify in detail all information provided by EDiS upon which you relied.